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9
10 IN THE UNITED STATES BANKRUPTCY COURT

11 FOR THE DISTRICT OF OREGON

12 In re

13 Blue Herron Paper Company,

14 Debtor.

Case No. 09-40921-rld11

**WELLS FARGO'S MOTION TO
CONTINUE HEARING ON ITS
MOTION TO CONVERT CASE TO
CHAPTER 7**

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16 Wells Fargo Bank, N.A. ("Wells Fargo") has reached an agreement with
17 Debtor for the immediate appointment of a Chapter 11 Trustee and a short continuance of the
18 hearing on the Motion to Convert Case to Chapter 7 [Docket No. 532] ("Motion"). Wells
19 Fargo requests that the hearing on its Motion be continued for one week to 10 days. Wells
20 Fargo expects that it will be able to reach an agreement with the proposed Chapter 11 Trustee
21 on the appropriate use of cash collateral pending the continued hearing on Wells Fargo's

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1 Motion. Wells Fargo has spoken with Debtor's counsel on this matter and the parties are in
2 agreement as set forth above.

3 Respectfully submitted this 21st day of March, 2011.

4 TONKON TORP LLP

5 By /s/ Timothy J. Conway

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7 Michael W. Fletcher, OSB No. 010448

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **WELLS FARGO'S MOTION TO CONTINUE HEARING ON ITS MOTION TO CONVERT CASE TO CHAPTER 7** on the parties indicated as "ECF" on the attached List of Interested Parties by electronic means through the Court's Case Management/Electronic Case File system on the date set forth below.

In addition, I served the foregoing on the parties indicated as "Non-ECF" on the attached List of Interested Parties:

☒ by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to each attorney's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below;

☐ by causing a copy thereof to be hand-delivered to said attorneys at each attorney's last-known office address on the date set forth below;

☐ by sending a copy thereof via overnight courier in a sealed, prepaid envelope, addressed to each attorney's last-known address on the date set forth below; or

☐ by faxing a copy thereof to each attorney at his last-known facsimile number on the date set forth below.

DATED this 21st day of March, 2011.

TONKON TORP LLP

By /s/ Timothy J. Conway

Timothy J. Conway, OSB No. 851752

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In re Blue Heron Paper Company
US Bankruptcy Court Case No. 09-40921-rld11

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